

Exhibit A

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Stacey Kaminer – April 20, 2021

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 MASTER DOCKET 18-MD-2865 (LAK)
4 CASE NO. 18-CV-09797

5 IN RE:

6 CUSTOMS AND TAX ADMINISTRATION OF
7 THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
8 SCHEME LITIGATION

9
10
11 CONFIDENTIAL – ATTORNEYS' EYES ONLY

12
13
14 DEPOSITION OF
15 STACEY KAMINER
VOLUME 2

16 Tuesday, April 20, 2021
17 8:08 a.m. – 2:35 p.m.

18 Remote Location
19 Via Huseby Connect
20 All Parties Remote

21
22
23
24 Stenographically Reported By:
25 Erica Field, FPR

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1 A. Yes.

2 Q. And this reflects all of the shares --
3 withdrawn.

4 During the time period between 2012 and
5 2015, there were two members of Acer, correct, you and
6 Mr. Crema?

7 A. We were the two class A members of Acer.

8 Q. And there were -- Mr. Goldman was an
9 employee?

10 A. Yes.

11 Q. And Mr. Messina was an employee, correct?

12 A. Yes.

13 Q. And, you know, in 2012, at the beginning of
14 2012, Acer's principal place of business was New Jersey,
15 right?

16 A. Yes.

17 Q. And at some point, Acer relocated its
18 business to Florida; is that correct?

19 A. Yes.

20 Q. And Acer's principal place of business in
21 2015 was Florida, correct?

22 A. Yes.

23 MR. BLESSINGTON: Objection.

24 You can answer.

25 A. Yes.

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1 BY MR. BINDER:

2 Q. And Acer's principal place of business
3 remains there today, right?

4 MR. BLESSINGTON: Objection.

5 A. Yes.

6 BY MR. BINDER:

7 Q. Could we take a look at -- let me ask
8 you -- Mr. Crema, in 2012, lived in New Jersey; is that
9 right?

10 A. Mr. Crema owned a house in New Jersey and a
11 house in Florida.

12 Q. So he was living either in New Jersey or
13 Florida at various times?

14 A. Yes.

15 Q. Okay. As far as you are aware, between
16 2012 and today, has he lived in any other state?

17 A. No.

18 Q. And Mr. Goldman was an employee at Acer
19 between 2012 and 2015, correct?

20 A. Yes.

21 Q. I believe you testified yesterday that he
22 has homes also -- well, in Florida and New York; is that
23 right?

24 A. Yes.

25 Q. Where does he principally live?

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1 A. I don't know.

2 Q. But it's one of those two states, New York
3 or Florida?

4 MR. BLESSINGTON: Objection. Do you know?

5 BY MR. BINDER:

6 Q. As far as you're aware?

7 A. As far as I am aware, yes.

8 Q. And Mr. Messina, he was living in Florida
9 when he was working for Acer until close to the end of
10 his employment, correct?

11 A. After the office moved to Florida, correct.

12 Q. Can you take a look at Exhibit 2524? Let
13 me know when you have that.

14 A. I have that open.

15 Q. And this is a document -- this is an e-mail
16 from Mr. Goldman to ED&F and it attaches an invoice from
17 Acer, correct?

18 THE WITNESS: Can you go back up to the
19 e-mail?

20 A. Yes.

21 BY MR. BINDER:

22 Q. And the e-mail from Mr. Goldman on May 20,
23 2015, below his name, he provides an address, correct?

24 A. Yes.

25 Q. And that address is in Bonita Springs,

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1 Florida, right?

2 A. Yes.

3 Q. And the attachment is an invoice from Acer
4 Investment Group LLC.

5 Do you see that?

6 A. Yes.

7 Q. It's signed by you?

8 MR. BLESSINGTON: Hold on.

9 A. It's an attached signature that I
10 authorized.

11 MR. BINDER: John, you there -- you ready?

12 MR. BLESSINGTON: Yeah.

13 BY MR. BINDER:

14 Q. And the -- so the invoice to the attention
15 of Victoria Foster and Marcus Howard is addressed to ED&F
16 Man Capital Markets Limited in London.

17 Do you see that?

18 A. Yes.

19 Q. And the address of Acer Investments Group
20 LLC is in Bonita Springs, Florida.

21 Do you see that?

22 A. Yes.

23 MR. BINDER: I have no further questions at
24 this time. Thank you.

25 MR. BLESSINGTON: If we can -- why don't we



Dividend Finder Fee billing : DANSKE DC, NOVOB DC, PNDORA DC

From: Alan Goldman <ag@acerinvest.com>
To: cscanlan@edfmancapital.com, mhoward@edfmancapital.com
Cc: vfooster@edfmancapital.com, Stacey Kaminer <sk@acerinvest.com>
Date: Wed, 20 May 2015 16:16:40 +0100
Attachments: EDFINVOICEMay 20.pdf (73.07 kB)

Hi Marcus/Chris,

Attached is the Acer Investment Group LLC billing for DANSKE DC (3,400,000 shares), NOVOB DC (4,000,000 shares) and PNDORA (700,950 shares).

Regards,

Alan Goldman
Chief Financial Officer
Acer Investment Group, LLC
3372 Woods Edge Circle, Suite 104
Bonita Springs, FL 34134

Chief Financial Officer
Acer Investment Group, LLC
3372 Woods Edge Circle, Suite 104
Bonita Springs, FL 34134

ACER INVESTMENT GROUP, LLC
3372 Woods Edge Circle, Suite 104
Bonita Springs, FL 34134
Phone (239) 908-9859 - Fax (239) 908-9864

May 20, 2015

ED&F Man Capital Markets Limited
Cottons Centre
Hay's Lane
London, SE1 2QE

Att:Victoria Foster and Marcus Howard

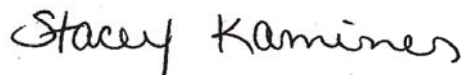
INVOICE

Please remit DKK 1,619,388 as per the following details:

<u>Stock</u>	<u>Shares</u>	<u>Dividend</u>	<u>Rate</u>	<u>Fee</u>
DANSKE DC	3,400,000	DKK 5.50	4.200%	DKK 785,400
NOVOB DC	4,000,000	DKK 5.00	3.200%	DKK 640,000
PNDORA DC	700,950	DKK 9.00	3.075%	DKK 193,988

All requested funds should be credited to the Acer Investment account at
ED&F Man Capital Markets, acct 1-020-010-ACERIN-GPLLC.

Regards,



Stacey Kaminer
Member